

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re:

EARLE STANLEY GREER,

Chapter 11

Case No. 18-18146-elf

Debtor

ORDER CONDITIONALLY APPROVING DISCLOSURE STATEMENT, FIXING
TIME FOR FILING ACCEPTANCES OR REJECTIONS OF THE PLAN, AND FIXING
THE TIME FOR FILING OBJECTIONS TO THE DISCLOSURE STATEMENT AND
CONFIRMATION OF THE PLAN

AND NOW, this day of , 2019, upon consideration of the Motion (the
"Motion") of Earle Stanley Greer (the "Debtor") for conditional approval of his Disclosure
Statement and related relief, pursuant to 11 U.S.C. § 112S(f); and for good cause shown, it is
hereby

ORDERED AND DECREED that;

1. The Debtor's Disclosure Statement dated October 3, 2019 is
Conditionally approved.
2. Within two (2) days after the entry of this Order, the Debtor shall mail the
following voting materials to creditors and other parties' interest, the United States Trustee, all
persons who have requested notice in this case pursuant to Fed. R. Bank. P. 2002 as required by
Fed. R. Bankr. P. 3017(d):
 - (a) this Order;
 - (b) the Debtor's Disclosure Statement;
 - (c) the Debtor's Small Business Plan of Reorganization (the "Plan"); and
 - (d) the form of ballot that conforms substantially to Official Bankruptcy Form

3. _____, 2019 is fixed as the last date for filing and serving written objections to the Disclosure Statement and confirmation of the Plan.

4. _____, 2019 is fixed as the last date by which the ballots must be received by counsel to the Debtor to be considered as acceptances or rejections of the Plan.

5. _____, 2019 is fixed as the date by which the Debtor shall file the Report of Plan Voting.

6. A hearing shall be held before the Honorable Eric L. Frank, United States Bankruptcy Judge, in Courtroom # 1, 900 Market Street, Philadelphia, PA 19107 on _____ ' 2019 at ___ a. m./p.m., (a date within 45 days of the filing of the Plan) for final approval of the Disclosure Statement (if a written objection has been timely filed) and for confirmation of the Plan.

By the Court:

Honorable Eric L. Frank
United States Bankruptcy Judge

cc: Attached Service List

¹ To be provided by the Debtor only to Classes of Claims entitled to vote under the Debtors' Plan.

SERVICE LIST

Dave P. Adams

Office of the United States Trustee
833 Chestnut Street, Suite 500
Philadelphia, PA 19107

Valerie A. Hibbert, Esquire
18 North Lansdowne Avenue
Lansdowne, P A 19050

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re:

EARLE STANLEY GREER,

Chapter 11

Debtor
Case No. 18-18146-elf

MOTION OF THE DEBTOR EARLE STANLEY GREER FOR AN ORDER CONDITIONALLY
APPROVING SMALL BUSINESS DEBTOR'S DISCLOSURE STATEMENT, FIXING
TIME FOR FILING ACCEPTANCES OR REJECTIONS OF THE PLAN, AND FIXING
THE TIME FOR FILING OBJECTIONS TO THE DISCLOSURE STATEMENT AND
CONFIRMATION OF THE PLAN

Earle Stanley Greer (the "Debtor"), by and through his undersigned counsel, Valerie A. Hibbert, Esquire, and pursuant to 11 U.S.C. § 1125(f) and Rules 3017.1-1 and 9013-2(a)(2) of the Local Rules of Bankruptcy Procedure, hereby applies for an Order conditionally approving his Disclosure Statement and for related relief; and in support hereof, states as follows:

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. § 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(A)(L), and (O). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.
2. The statutory predicates for the requested relief are 11 U.S.C. § 1125, Federal Rule of Bankruptcy Procedure (the "Bankruptcy Rules") 2002, 3016, 3017 and 3017.1 and Local Bankruptcy Rule ("L.B.R.") 3017.1-1.
3. On December 11, 2018 (the "Greer Petition Date"), Greer filed voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code, 11 U.S.C. §§ 101 *et seq.* (as amended, the "Bankruptcy Code").
4. No request has been made for the appointment of a trustee or examiner in the Debtor's Chapter 11 Case.

5. Since the Petition Debtor has been operating his business as debtor in possession.
6. On October 3, 2019, the Debtor filed a Chapter 11 Small Business Disclosure Statement and Plan for the Court's Consideration.
7. The Debtor hereby requests that the Court enter an Order conditionally approving the Disclosure Statement and scheduling a combined hearing for final approval of the Disclosure Statement and confirmation of the Debtor's Small Business Chapter 11 Plan.
8. No prior request for the relief requested herein has been made to this Court or any other court in connection with the Chapter 11 Case of the Debtor.

WHEREFORE, the Debtor respectfully request that this Court enter an Order in the form annexed hereto granting the Motion.

Respectfully submitted,

Dated: October 3, 2019

By: ***Valerie A. Hibbert, Esq.***
Valerie A. Hibbert, Esquire
18 North Lansdowne Avenue
Lansdowne, PA 19050
Telephone - (610) 622-3660
Email: vah963@gmail.com
Attorney to the Debtor Earle Stanley Greer

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re:

Chapter 11
Case No. 18-18146-elf

EARLE STANLEY
GREER,

Debtor.

MOTION OF THE DEBTOR EARLE STANLEY GREER FOR AN ORDER CONDITIONALLY
APPROVING SMALL BUSINESS DEBTOR'S DISCLOSURE STATEMENT, FIXING
TIME FOR FILING ACCEPTANCES OR REJECTIONS OF THE PLAN, AND FIXING
THE TIME FOR FILING OBJECTIONS TO THE DISCLOSURE STATEMENT AND
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Earle Stanley Greer (the "Debtor"), by and through his undersigned counsel, Valerie A. Hibbert, Esquire, and pursuant to 11 U.S.C. § 1125(f) and Rules 3017.1-1 and 9013-2(a)(2) of the Local Rules of Bankruptcy Procedure, hereby applies for an Order conditionally approving his Disclosure Statement and for related relief; and in support hereof, states as follows:

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. § 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(A)(L), and (O). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.
2. The statutory predicates for the requested relief are 11 U.S.C. § 1125, Federal Rule of Bankruptcy Procedure (the "Bankruptcy Rules") 2002, 3016, 3017 and 3017.1 and Local Bankruptcy Rule ("L.B.R.") 3017.1-1.
3. On December 11, 2018 (the "Greer Petition Date"), Greer filed voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code, 11 U.S.C. §§ 101 *et seq.* (as amended, the "Bankruptcy Code").

5. Since the Petition Date, the Debtor has been operating his business as debtor in possession.

6. On October 3, 2019, the Debtor filed a Chapter 11 Small Business Disclosure Statement and Plan for the Court's Consideration.

7. The Debtor hereby requests that the Court enter an Order conditionally approving the Disclosure Statement and scheduling a combined hearing for final approval of the Disclosure Statement and confirmation of the Debtor's Small Business Chapter 11 Plan.

8. No prior request for the relief requested herein has been made to this Court or any other court in connection with the Chapter 11 Case of the Debtor.

WHEREFORE, the Debtor respectfully request that this Court enter an Order in the form annexed hereto granting the Motion.

Respectfully submitted,

Dated: October 3, 2019

By: ***Valerie A. Hibbert, Esq.***
Valerie A. Hibbert, Esquire
18 North Lansdowne Avenue
Lansdowne, PA 19050
Telephone - (610) 622-3660
Email: vah963@gmail.com
Attorney to the Debtor Earle Stanley Greer